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ATTORNEYS FOR DEBTOR
AND DEBTOR-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:		Chapter 11 (V)
	§	
KERWIN BURL STEPHENS,	§	Case No.: 21-40817-elm-11
	§	
THUNDERBIRD OIL & GAS, LLC,	§	Case No.: 21-41010-elm-11
	§	
THUNDERBIRD RESOURCES, LLC,	§	Case No.: 21-41011-elm- 11
	§	
Debtors.	§	Jointly Administered Under
	§	Case No. 21-40817-elm-11
	§	

**EMERGENCY MOTION TO TAKE WITNESS OUT OF TIME
AND EXTEND DATE FOR COMPLETION OF HEARING**

TO THE HONORABLE EDWARD LEE MORRIS, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Kerwin Stephens (“Debtor”), as debtor-in-possession, and files this
Emergency Motion to Take Witness Out of Time and Extend Date for Completion of Hearing
(the “Motion”).

1. The Debtor has proposed an Amended Plan of Reorganization (“Plan”). The confirmation hearing on the Plan is set for March 21, 2025, commencing at 9:30 a.m. One of the witnesses will be Steve Turner testifying as an appraiser to the value of two tracts of real property (the Bunger Place and the Furr Place) which are subject to the proposed Plan.

2. Unfortunately, Mr. Turner’s wife will be undergoing emergency cancer treatment in Oklahoma City on March 20 and 21, 2025. Consequently, Mr. Turner is unexpectedly

unavailable on that day.

3. The Debtor moves the Court to allow him to call all of his witnesses other than Mr. Turner at the March 21st hearing and then recess the hearing to be completed at a later date.

4. Unfortunately, the Debtor will be unavailable for virtually all of April based on his own cancer treatments.

5. The Debtor requests that the Court set this continuation of the hearing to 1:30 p.m. on May 16, 2025.

6. Counsel for the Debtor has conferred with John D. Spicer, counsel for the Plaintiffs, Tiburon Land & Cattle, LP and Trek Resources, Inc., and he has no objections to so proceeding.

PRAYER FOR RELIEF

Accordingly, Debtor requests the relief set forth above.

Dated: March 19, 2025

Respectfully submitted,

/s/ J. Robert Forshey
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via ECF electronic Notice, if available, on March 19, 2025.

/s/ J. Robert Forshey
J. Robert Forshey

[https://vhhlawyers.sharepoint.com/sites/bankruptcy/Shared Documents/BForshey/Stephens, Kerwin \(C11\) #5779/Pleadings 21-40817-elm11 \(V\)/Emergency Mo to Take Witness \(Appraiser\) Out of Time 3.19.25.docx](https://vhhlawyers.sharepoint.com/sites/bankruptcy/Shared Documents/BForshey/Stephens, Kerwin (C11) #5779/Pleadings 21-40817-elm11 (V)/Emergency Mo to Take Witness (Appraiser) Out of Time 3.19.25.docx)